

**HALE LANE PEEK
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*A Professional Corporation
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Matthew E. Woodhead
Michelle D. Mullins

Office Address:
100 West Liberty Street, Tenth Floor
Reno, Nevada 89501

Mailing Address:
Post Office Box 3237
Reno, Nevada 89505

(702) 327-3000
(702) 786-7900
Facsimile (702) 786-6179

Lance C. Earl
Jeremy J. Nork
Robert C. Vohl
Elissa F. Cadish
Pauline Ng Lee
Kimberly A. Chadin
Timothy A. Lukas
Jeanette E. McPherson
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Noah G. Allison

Andrew Pearl - Of Counsel
Roy Farrow - Of Counsel
Linda E. Johnson - Of Counsel

July 28, 1998

VIA FACSIMILE

1-702-782-8362

George Abbott, Esquire
Post Office Box 98
Minden, Nevada 89423

**Re: Armstrong v. Church of Scientology International, et al
Our File Number 13860-0001**

Dear Mr. Abbott:

On Monday, July 20, 1998, I was informed by your secretary, Mary, that the August 3, 1998 date set for the Plaintiff's deposition was inconvenient because you were not in the State of Nevada. I asked Mary for acceptable dates and she promised to pass the request on inasmuch as you were on your way to California at the time. I called several times to propose alternate dates but did not receive a response until we spoke last Friday, July 24, 1998. During our lengthy conversation you stated several times that Mr. Armstrong would not appear for any deposition so long as the two arrest warrants were outstanding. Regrettably, this required me to file the Motion to Compel Discovery.

I have recently received Notices setting depositions of various individuals for the first two weeks of August. This is most curious given your previous claims of unavailability. Incredibility aside, these Notices are improper, vexatious and constitute a transparent attempt to avoid the Judge Reed's orders.

Judge Reed's Orders on the Defendants' Motions to Dismiss limit the issue to be determined at the August 20, 1998, hearing to Gerald Armstrong's residency. This is the sole support of his claim of subject matter jurisdiction. The individuals you have noticed for deposition have absolutely no evidence to give on the issue of Gerald Armstrong's residency in Nevada. First, David Miscavige

LAS VEGAS OFFICE: 2300 West Sahara Avenue, Eighth Floor, Box 8, Las Vegas, Nevada 89102
(702) 222-2500 or (702) 362-5118 • Facsimile (702) 365-6940
CARSON CITY OFFICE: 777 East William Street, Suite 201, Post Office Box 2620, Carson City, Nevada 89702
(702) 684-6000 • Facsimile (702) 684-6001

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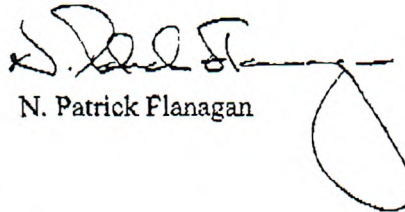
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has been dismissed out of this case by Judge Reed. He has absolutely no evidence as to the whereabouts of Mr. Armstrong. It is clear that, despite Judge Reed's order, Mr. Armstrong intends to continue to harass Mr. Miscavige. Second, there is no evidence that Mr. Rinder has any knowledge or information as to Mr. Armstrong's residency. Nothing in his declaration indicates he has any information about Mr. Armstrong's residency. There is no other information which would lead you to find he had any evidence to give on the issue before this Court. Third, you have noticed the deposition of "WGERT." Could you enlighten me as to whom *that* is?

The issue to be resolved is simple: Was Mr. Armstrong a Nevada resident at the time he filed this complaint? The best source is Mr. Armstrong himself and any documents (such as driver license applications) which support his position. That is the sole subject upon which we wish to depose Mr. Armstrong. No one you have noticed has any better information on that subject.

We demand withdrawal of the Notices of Depositions for Messrs. Miscavige, Rinder and WGERT by 5:00 p.m., Wednesday, July 29, 1998. If these Notices are not withdrawn, we will have no choice but to obtain a protective order and seek sanctions to recover our related expenses.

Sincerely,



N. Patrick Flanagan

NPF:ngg